

DEPARTMENT OF  
HEALTH AND ENVIRONMENTAL SCIENCES  
AIR QUALITY DIVISION

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DEC 29 1994  
Montana Department of Health  
and Environmental Sciences  
Waste Management Division

**OFFICE MEMORANDUM**

**TO:** Richard Knatterud, Waste Management Division **DATE:** December 23, 1994  
**FROM:** Gretchen Bennett, Air Quality Division *GB*  
**SUBJECT:** RCRA

As you know, the Air Quality Division is proposing that ASARCO be responsible for sweeping the streets of East Helena as part of a required control strategy for lead emissions. Attached is a TCLP analysis of the street sweeping samples sent to us by ASARCO. Note that the second sample fails the TCLP for lead. Although ASARCO did not yet supply us with the details of sample collection, we do know that these samples were collected from the street sweeper after sweeping random streets in East Helena.

Can you do me a favor and let me know whether ASARCO can dump this hazardous material directly into their blast furnace for reclamation under RCRA? I will need to confirm with ASARCO whether they will be storing the material in an intermediary storage area.

For your further information, our division is planning on collecting street sweeper samples within the next few weeks and performing another TCLP for verification.

Thanks again for your continued assistance.

GB:bjd

cc: Stephanie Wallace, RCRA (MT Office)  
Jon Nickel, ASARCO

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To <i>Stephanie Wallace</i>	From <i>RCK</i>	
Co. <i>EPA</i>	Co. <i>MT DHES</i>	
Dept.	Phone #	
Fax #	Fax #	

## ASARCO TECHNICAL SERVICES CENTER

## ANALYTICAL DATA REPORT

East Helena

Technical Services (Project 3101)

Batch No: L961875

01/04/95 15:54  
11-28-94 10:31AM FROM ASARCO INC

TO 4445275

P010/010

NO. 738 D02

L961875-1 01-SEP-94 ENRM-9408-251 TCLP

AG	<.05	ppm	KPB	18-OCT-94	200.7
AS	.17	ppm	KPB	18-OCT-94	200.7
BA	.78	ppm	KPB	18-OCT-94	200.7
CO	.76	ppm	KPB	18-OCT-94	200.7
CR	<.10	ppm	KPB	18-OCT-94	200.7
HG	<.5	ppb	ID	19-OCT-94	245.1
PB	2.7	ppm	KPB	18-OCT-94	200.7
PE	8.8	pph	MN	17-OCT-94	150.1
SE	<.10	ppm	KPB	18-OCT-94	200.7

L961875-2 23-SEP-94 ENRM-9409-268 TCLP

AG	<.05	ppm	KPB	18-OCT-94	200.7
AS	.38	ppm	KPB	18-OCT-94	200.7
BA	.87	ppm	KPB	18-OCT-94	200.7
CO	.88	ppm	KPB	18-OCT-94	200.7
CR	<.10	ppm	KPB	18-OCT-94	200.7
HG	<.5	ppb	ID	19-OCT-94	245.1
PB	5.7	ppm	KPB	18-OCT-94	200.7
PE	8.9	pph	MN	17-OCT-94	150.1
SE	<.10	ppm	KPB	18-OCT-94	200.7

Vince Keller  
Approved

Vince Keller  
Reviewer